CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	New Letz
Proposed Implementation Date:	Summer 2022
Proponent:	Salois Construction 20 N Iowa Conrad, MT 59425
Location:	Township 29N, Range 2W, Section 26 $SW^1/_2SW^1/_2$
County:	Pondera

I. TYPE AND PURPOSE OF ACTION

Salois Construction has applied for an aggregate take and removal permit from the Minerals Management Bureau of the Montana DNRC. This document will analyze the impacts that the project could create on the environment.

If the action alternative is selected Salois Construction would be granted permission to mine and remove gravel from state lands. The proponent would be allowed to excavate gravel from the ground and sub-surface using heavy machinery and other equipment as deemed necessary.

It shall be noted that a portion of this project is proposed to occur in a former gravel mine site, and on surface that has been disturbed prior.

All Topsoil would be retained for future use in reclamation.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project.

The Montana DNRC (formerly the Department of State Lands) has managed and maintained a gravel permit with several other proponents and Salois Construction on this tract since the early 1970's. Recently, the Department was approached by the proponent about the possibility of expanding the permitted area to include approximately 8.8 acres. An opencut permit application has been filed to the Montana DEQ's Opencut Mining Bureau.

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

Montana DEQ – Opencut Mining Permit
Montana DNRC – Aggregate take and remove permit

3. ALTERNATIVES CONSIDERED:

No Action Alternative: The proponent would not be authorized to disturb the project area.

Action Alternative: The proponent would be allowed to mine aggregate within the project area.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:
Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.

No unique or unusual geologic features are present within the project area.

Per the Montana Bureau of Mines and Geology, the project area contains one geologic member, Glacial Deposit. The member is described as primarily till and outwash deposited by glaciers, but also includes local glacial lake and other glacial deposits. Locally derived, poorly sorted, unconsolidated, boulder deposits with clasts as large as 3 m (10 ft) in diameter.

Soils in the project area contains the Neldore-Lambeth-Rock outcrop complex and Attewan-Wabek complex.

Soil characteristics in the project area include no rating for erosion hazard, moderate resistance to soil compaction, high potential for soil restoration and are well suited for roads on the natural surface.

Per the agreement of both the DEQ opencut permit, and the Montana DNRC take and remove permit, all topsoil and overburden would be stockpiled and reserved for reclamation of the site.

No action alternative: The current geology and soils in the project area would remain undisturbed, as they currently exist.

Action alternative: The proponent would strip and stockpile the topsoil and overburden from the project area and proceed with mining the subsurface for aggregate resources.

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:
Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.

Section 26 contains an ephemeral drainage, Dry Fork Marias River, that drains into the Marias River. All liquids including fuel tanks would be stored in a secondary-impermeable container.

The FWS layer shows this site is adjacent to a wetlands area. However, current site conditions are dry and there is no wetland area within the vicinity of the project. Disturbance boundaries would be greater than 1,100 feet from wetlands. The proposed excavation is shallow and would not encounter groundwater. Existing roads are in good condition and are well graded and built with draining soils.

A search on the Montana Ground Water Information Center website yielded there are no groundwater wells located within one-half mile of the project location.

No action alternative: The current ground and surface water in the area will not change in abundance or quality.

Action alternative: Due to the apparent elevation of the ground and surface water levels in the surrounding area, and the proposed depth of mining, there is no anticipated long-term impacts to the quality of the surface or ground water by implementing the action alternative.

6. AIR QUALITY:
What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.

Airborne pollutants and particulates occur during mining operations from vehicle and heavy equipment exhaust used to mine. Dust particulates also occur due to mining operations and truck traffic.

No action alternative: The proponent would continue to mine within the pre-existing disturbance. The current operations produce airborne pollutants and dust from gravel mining.

Action alternative: The proponent would mine new undisturbed ground within the project area. This may create a temporary increase in airborne pollutants and dust particulates. However, the increase in pollutants and dust particulates would have minimal effects to the environment.

7. VEGETATION COVER, QUANTITY AND QUALITY:
What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.

This area was previously used as a gravel pit and has some revegetation around the older workings with native range vegetation. The project area consists of primarily two land cover systems, Grassland system containing Great Plains Mixed Grass Prairie and recently disturbed or modified from previous mining activities.

An inventory of the Montana Natural Heritage Program's Species of Concern database was conducted for the project area. The search yielded two invasive weed species were identified in the area, Spotted Knapweed and Leafy Spurge. As part of an aggregate take and remove permit, the permitee is responsible for the management and mitigation of invasive weeds in the pit area.

No action alternative: The current vegetation would remain relatively unchanged. Factors unrelated to pit expansion such as overgrazing or weed introduction could change the tract's vegetative composition.

Action alternative: The vegetation in the project area would be stripped along with the topsoil and overburden. It would be included in the stockpiled topsoil and would provide good organic material to the soil. Upon reclamation, the topsoil and overburden would be replaced on the pit area. The operator would then reseed the affected area with a native range grass mixture approved by the Department.

8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.

The project area provides habitat to a variety of wildlife species. Deer and antelope are present in the vicinity of the project area as well as predatory birds such as hawks. The project vicinity also contains small rodents and mammals along with small to medium sized predators such as foxes and coyotes. The project area consists of native rangeland that provides forage to ungulate species in the area and habitat for burrowing species such as mice, gopher, fox, and coyote. The project area does not contain rivers, streams, tributaries, or trees. The project area is also directly adjacent to an active pit area where mining is already occurring. Noise associated with the mining of aggregate is not expected to vary significantly based upon which alternative is selected.

No action alternative: The project area would remain undisturbed by mining activities and the forage and habitat for the species in the project vicinity would remain relatively unchanged.

Action alternative: The project area would be stripped of vegetation and topsoil, then subsequently mined. This would temporarily decrease the forage and habitat for the species identified above. However, the size of the project area and length of the Action alternative are not substantiative enough to permanently disrupt wildlife in the area. Similar habitat and forage can be found surrounding the project area and could sustain the wildlife species displaced during the mining of the project area.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:
Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

An inventory of the Montana Natural Heritage Program's animal Species of Concern database was conducted for the project area. The project area yielded no observations for species of concern, within on half mile of the project area. As previously outlined within this document, the project area consists of native rangeland with no trees, water features, or wetlands. Native range grasses are abundant in the area and can be utilized by animals that may be displaced.

No action alternative: The project area would not be disturbed, and the species of concern would see little to no change to the current environment.

Action alternative: The project area would be mined, and the rangeland would be temporarily disturbed. The cumulative effects to any species of concern would be negligible. Rangelands are abundant in the project vicinity and animals would utilize surrounding areas during the temporary disturbance and would have the ability to return to the site upon reclamation.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:
Identify and determine effects to historical, archaeological or paleontological resources.

A cultural resource inventory was conducted for the project area by the Department's archeologist. The State Historical Preservation Office was consulted. A corresponding letter and report are on record.

No action alternative: The project area would remain undisturbed, and the existing ground would remain unchanged.

Action alternative: The project area would be mined for aggregate resources. No effects to cultural, archeological, or paleontological resources are anticipated resulting from the action alternative. However, if any of these resources are encountered during mining activities it is the operator's responsibility to cease action and call the area office.

11. AESTHETICS:
Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.

Impacts to aesthetics would be minimal during most of the project. There would be increases to noise when actively mining. The current pit is not visible from any populated or scenic areas.

No action alternative: Aesthetics would remain in their current state.

Action alternative: The expanded pit area is located 6.7 miles from Interstate 15 and 9.4 miles from Conrad. As a final step in the mining plan, the operator would grade the affected land to 3:1 or flatter slopes for rangeland and 5:1 or flatter slopes for farmland and cropland. The operator will replace permitted amount of overburden and all soils and blend the graded land into the surrounding topography.

12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:
Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.

No action alternative: There would be no change to demands on environmental resources.

Action alternative: The action alternative would have negligible affects to the environmental resources.

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:
List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

The Montana DEQ will construct an Environmental Assessment as part of their permitting process. The document can be found on the DEQ's website. No other leases are currently on this project area through the Montana DNRC's Trust Lands Management Division.

No action alternative: The project area would not be mined.

Action alternative: The project area would be mined for the underlying gravel resource. This would temporarily render the project area incapable of the possibility of grazing due to the stripping of vegetation and topsoil.

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

14. HUMAN HEALTH AND SAFETY:
Identify any health and safety risks posed by the project.

No human and health safety risks were identified because of the proposed project, other than the typical occupational hazards that coincide with gravel mining operations.

No action alternative: Negligible effects

Action alternative: Negligible effects

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

The proposed project would provide a needed resource for industrial and commercial projects in the area.

No action alternative: There would be little to no change in commercial or agriculture activities from the implementation of this alternative.

Action alternative: The action alternative would allow for a reliable aggregate resource to continue serving the surrounding areas.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.

No action alternative: Negligible effects to local employment.

Action alternative: The action alternative would have negligible effects to local employment.

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:
Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

No action alternative: Negligible effect.

Action Alternative: Negligible effect.

18. DEMAND FOR GOVERNMENT SERVICES:
Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services.

No action alternative: Traffic patterns and density are not expected to change from the no action alternative.

Action alternative: Traffic patterns are not expected to significantly change from the action alternative. However, there may be an increase in trucks entering and exiting the pit area if the action alternative is selected.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:
List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

No action alternative: The project area would not be mined and therefore zoning and local management plans would not be applicable.

Action alternative: The project area has obtained zoning clearance through Pondera County. This is obtained as a condition of the DEQ operating permit.

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.

No action alternative: There will be no cumulative affects to recreation or wilderness activities if the project area is not mined.

Action alternative: The project area would temporarily render approximately 8.8 acres of public land inaccessible and unusable in terms of recreation. This project area is not frequently used for local recreation and does not provide access to wilderness activities.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:
Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing.

No action alternative: No impact.

Action alternative: Negligible impact.

22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

No action alternative: No impact

Action alternative: Negligible impact.

23. CULTURAL UNIQUENESS AND DIVERSITY:
How would the action affect any unique quality of the area?

No action alternative: No impact

Action alternative: Negligible impact

24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:
Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur as a result of the proposed action.

No action alternative: Currently, the project area is not being utilized. If the no action alternative is selected, the project area will not generate further revenue.

Action alternative: If the action alternative were selected mining would begin within the project area. Assuming a 50% reject, and a mining depth of 10 feet, the undisturbed project area could generate approximately 118,000 yd^3 of aggregate. The royalty for gravel on this site would be $1.50/cubic yard. If that price were to remain unchanged over the life of the project, the project area has the potential to create $177,000 for the Trust. Upon reclamation of the gravel pit, the entirety of the pit acreage will be returned to grazing land.

EA Checklist Prepared By:	**Name:**	Thomas Palin	**Date:**	6/8/2022
	Title:	Mineral Resource Specialist		

V. FINDING

25. ALTERNATIVE SELECTED:

By constructing this Environmental Assessment, the Department has identified impacts to the environment based on two potential alternatives. The Department has selected the action alternative and will authorize Salois Construction to mine the project area for aggregate resource. The Department believes this alternative can be implemented in a manner that is consistent with the long-term sustainable natural resource management of the area and generate revenue for the common school trust. It also is consistent with the mission of the Montana State Trust Lands Management Division.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I conclude identified potential impacts will be mitigated by utilizing the stipulations listed below and no irreparable impacts to the environment will occur because of implementing the selected alternative.

a. Any additional expansion of the pit will require prior approval from the Department.

b. All disturbed areas shall be seeded with State of Montana Certified or Registered seed in the amounts and species specified by the DNRC Conrad Unit Office. The seeding will be repeated until a satisfactory stand is established as determined by the Conrad Unit Office.

c. Permittee shall work with the DNRC Conrad Unit Office to develop and implement a weed management plan before closure of the permit.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ] EIS	[ ] More Detailed EA	[X] No Further Analysis

EA Checklist Approved By:	**Name:**	Zack Winfield
	Title:	Petroleum Engineer
Signature: Zack Winfield		**Date:** 6/8/2022